

UNITED STATES DISTRICT COURT  
District of Minnesota

UNITED STATES OF AMERICA,

Plaintiff,

INDICTMENT CR 15 -284 DWF/SER

18 U.S.C. § 2423(c)

v.

THOMAS ROBERT PAGE,

Defendant.

THE UNITED STATES GRAND JURY CHARGES THAT:

**GENERAL ALLEGATIONS**

1. The conduct alleged in this Indictment occurred outside the jurisdiction of any particular State or District and within the venue of the United States District Court for the District of Minnesota, as provided by 18 U.S.C. Section 3238. The District of Minnesota is the district of the last known residence of the defendant, THOMAS ROBERT PAGE.

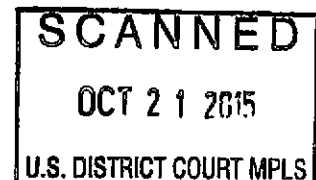
2. The conduct described herein occurred in and around Yaoundé, Cameroon, and outside the United States.

**COUNT 1**

(Engaging in Illicit Sexual Conduct in Foreign Places)

3. In or about 2007 through in or about 2010, in the State and District of Minnesota and elsewhere, the defendant,

**THOMAS ROBERT PAGE,**



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a citizen of the United States with last known residence within the District of Minnesota, did travel in foreign commerce and reside temporarily in Cameroon, where he engaged in illicit sexual conduct as defined in Title 18, United States Code, Section 2423(f), with Minor A, a person less than 18 years of age, all in violation of Title 18, United States Code, Section 2423(c).

**COUNT 2**

(Engaging in Illicit Sexual Conduct in Foreign Places)

4. In or about 2007 through in or about 2010, in the State and District of Minnesota and elsewhere, the defendant,

**THOMAS ROBERT PAGE,**

a citizen of the United States with last known residence within the District of Minnesota, did travel in foreign commerce and reside temporarily in Cameroon, where he engaged in illicit sexual conduct as defined in Title 18, United States Code, Section 2423(f), with Minor B, a person less than 18 years of age, all in violation of Title 18, United States Code, Section 2423(c).

**COUNT 3**

(Engaging in Illicit Sexual Conduct in Foreign Places)

5. In or about 2007 through in or about 2010, in the State and District of Minnesota and elsewhere, the defendant,

**THOMAS ROBERT PAGE,**

a citizen of the United States with last known residence within the District of Minnesota, did travel in foreign commerce and reside temporarily in Cameroon, where he engaged in illicit sexual conduct as defined in Title 18, United States Code, Section 2423(f), with

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Minor C, a person less than 18 years of age, all in violation of Title 18, United States Code, Section 2423(c).

A TRUE BILL

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UNITED STATES ATTORNEY

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FOREPERSON